



State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES

6 Hazen Drive, P.O. Box 95, Concord, NH 03302-0095
(603) 271-1370 FAX (603) 271-1381



February 27, 2003

Shawne Deary
Safety and Environmental Affairs Manager
Parker Hannefin Corporation
Chomerics TEC Division
16 Flagstone Drive
Hudson, New Hampshire 03051

CERTIFIED MAIL (7099 3400 0003 0687 5098)
RETURN RECEIPT REQUESTED

NOTICE OF PAST VIOLATION

Dear Mr. Deary:

On December 3, 2002, the New Hampshire Department of Environmental Services, Air Resources Division ("DES") received a permit deviation report from Parker Hannefin's Chomerics TEC Division ("Chomerics") in Hudson, NH. Chomerics reported that for a 20 day period in November 2002, it was not in compliance with a requirement of State Permit to Operate FP-S-0196 ("the Permit"), to continuously record the temperature of the catalytic oxidizer incinerator bed. The purpose of this letter is to document this violation, and the actions taken by Chomerics to prevent its reoccurrence.

Condition VI.B of the Permit requires Chomerics to operate the TEC Systems Catalytic Oxidizer ("CATOX") following the requirements in RACT Order No. ARD 03-001 ("the Order"). Section D.1.f of the Order requires Chomerics to "operate and maintain equipment to continuously monitor and record the temperature of the catalytic incinerator bed". Chomerics maintains a circular strip chart recorder to continuously record this temperature. On December 3, 2002, Chomerics reported that during the period of November 8 through November 27, 2002, the circular chart failed to record the CATOX bed temperature. Since the destruction efficiency of the CATOX is dependent upon the CATOX being operated at sufficient temperature to achieve combustion of the volatile organic compounds, and the circular chart is the means of recordkeeping to show that the CATOX was operated at sufficient temperature, Chomerics does not have the temperature data to demonstrate that the CATOX was operated continuously during this period.

On February 11, 2003, DES requested that Chomerics submit any other data that would demonstrate that it had operated in compliance with the Permit and the Order during the period of November 8 through November 27, 2002. On February 14, 2003, Chomerics submitted to DES copies of the operator logsheets for the period in question. As part of its standard operating procedure, Chomerics requires the operator of the coating process to verify the CATOX is in operation and to sign off on the daily logsheet. DES accepts the logsheets submitted by Chomerics as an adequate demonstration that it operated in compliance with the Permit and the Order. However, in the future, Chomerics must comply with Section D.1.f of the Order and continuously monitor and record the temperature of the CATOX incinerator bed.

Chomerics' submittal of the permit deviation report to DES on December 3, 2002 and Chomerics' description in that report of the preventive measures taken to prevent future occurrences is acceptable as a corrective action to the violation noted in this NPV. DES believes that no further action in response to the listed violation is required. DES requests that Chomerics comply with all future reporting obligations contained in the Permit. Should the same type of violation reoccur and DES determines that enforcement action is necessary, such action may include issuing an administrative order, seeking administrative fines, and/or referring this matter to the New Hampshire Department of Justice for civil and/or criminal penalties.

If you believe that DES has cited these violations in error, or have questions regarding these matters, please contact Ray Walters at the Compliance Bureau, Air Resources Division, at (603) 271-6288. A current copy of the Air Resource Division rules can be obtained from the DES website at <http://www.des.state.nh.us/ard/ardrules.htm>, or by contacting the Public Information Center at (603) 271-2975.

Sincerely,

A handwritten signature in black ink is written over the word "COPY" in large, bold, black capital letters. The signature appears to be "P. Monroe".

Pamela G. Monroe
Compliance Bureau Administrator
Air Resources Division

PGM/raw

cc: G. Rule, NHDES-O/C
R. Kurowski, EPA Region I
K. Ortmann, City Manager Interim of Rochester
File AFS# 3301100115